

Edward F. Behm, Esquire  
Direct T 267.780.2030 F 215.405.9070  
ebehm@atllp.com

April 23, 2021

**VIA ECF**

The Honorable Zahid N. Quraishi  
U.S. District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: *UMG Records, Inc., et al. vs. RCN Telecom Services, LLC, et al.*  
Civil Action No. 19-17272-MAS-ZNQ

Dear Judge Quraishi:

This firm represents Defendants in the above-referenced matter. We write jointly on behalf of Defendants, Plaintiffs, and Counterclaim Defendants RIAA and Rightscorp to request a sixty (60) day extension of the following two deadlines: (1) deadline for the submission of written discovery disputes; and (2) deadline for the close of fact discovery. On February 26, 2021, the Court granted the parties' request to extend those deadlines to April 27, 2021 and July 30, 2021, respectively. *See* ECF No. 150.

The parties are continuing to work diligently and in good faith toward completing discovery, but the parties agree that additional time is necessary. At this point, all parties have additional documents to produce, and the parties also believe that additional time is warranted to allow the parties to attempt to resolve informally any issues regarding their respective privilege logs, which the parties expect to exchange in the very near future. Due to the parties' focus on written discovery, as well as pandemic-related circumstances, the parties have yet to conduct or schedule any depositions.

For this reason, the parties respectfully request that the above deadlines be extended by sixty (60) days as follows: (1) deadline for the submission of written discovery disputes be extended from April 27, 2021 to June 28, 2021; and (2) deadline for the completion of all fact discovery be extended from July 30, 2021 to September 28, 2021.

We have included a "So Ordered" provision at the end of this letter in the hope that this extension is acceptable to the Court.

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Respectfully Submitted,


/s/

Edward F. Behm, Jr.

EFB:gc

CC: All counsel of record via ECF

The above Application is SO ORDERED this 26<sup>th</sup> day of April, 2021.

  
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The Honorable Zahid N. Quraishi